

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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KRISTEN PIERSON	:	1:19-CV-00397
Plaintiff,	:	HON. P. KEVIN CASTEL
v.	:	
FACEBOOK, INC.,	:	
Defendant.	:	
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**DECLARATION OF J. MICHAEL KEYES IN SUPPORT OF
DEFENDANT’S MOTION FOR SANCTIONS**

I, J. Michael Keyes, declare as follows:

1. I am one of Defendant Facebook, Inc.’s (“Facebook”) trial counsel in this action. I make this declaration based on my personal knowledge. I am over the age of eighteen and am competent to testify to the matters set forth herein.
2. On May 16, 2019, Facebook served its First Set of Interrogatories and First Set of Document Requests on Plaintiff.
3. Plaintiff served Answers and Objections to Facebook’s Interrogatories and Responses to Facebook’s Document Requests on June 14, 2019. Both the answers to Facebook’s interrogatories and responses to Facebook’s requests for production of documents were signed by Richard Liebowitz on behalf of the Liebowitz Law Firm, PLLC, and dated June 14, 2019. True and correct copies of Plaintiff’s interrogatory answers and request for production responses dated

June 14, 2019 are attached hereto as **Exhibits A and B**, respectively.

4. On August 16, 2019, Facebook took Plaintiff Kristen Pierson's deposition. A true and correct copy of relevant portions of Plaintiff's deposition transcript is attached hereto as **Exhibit C**.

5. For this Court's reference, true and correct copies of the orders issued against Mr. Liebowitz in *Masi v. Mythical Ent.*, Case No. 5:19-CV-438-FL [EDNC, Oct. 4, 2019], and *Matter of Liebowitz v. Liebowitz*, Case No. 19-MC-80228-JD [NDCA, Oct. 7, 2019] are attached hereto as **Exhibits D and E**, respectively.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Signed this 15th day of October, 2019 at Seattle, Washington.

/s/ J. Michael Keyes
J. Michael Keyes

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record this 15th day of October, 2019 via the Court's CM/ECF system.

/s/ J. Michael Keyes

J. Michael Keyes